

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

v.

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(b)(1)

DAPREE RICHARD CHRISTLIEB-
PETERSON,

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

21 U.S.C. § 853(p)

Defendant.

28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

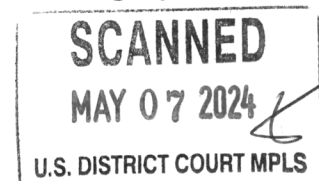
COUNT 1

(Production and Attempted Production of Child Pornography)

On or about June 17, 2022, in the State and District of Minnesota, the
defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

attempted to and did employ, use, persuade, induce, entice, and coerce Minor
A, a 17-year-old girl, to engage in sexually explicit conduct for the purpose of
producing a visual depiction of such conduct, including a recorded video with
the file name "BC20F16F-#C5C-40F3-B96C-4C8B38227F22.mov," that is
approximately 24 seconds in duration, that depicts a penis penetrating the
exposed genitalia of Minor A, where such visual depiction was produced and
transmitted using materials that had been mailed, shipped, and transported
in and affecting interstate and foreign commerce by any means, including by



cellular telephone all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2
(Production and Attempted Production of Child Pornography)

On or about May 14, 2022, in the State and District of Minnesota, the defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

attempted to and did, employ, use, persuade, induce, entice, and coerce Minor B, a 13-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including a recorded video with the file name "IMG_7223.mp4," that is approximately 56 seconds in duration, that depicts Minor B performing fellatio on a penis, where such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3
(Production and Attempted Production of Child Pornography)

Around or about July 3, 2022, in the State and District of Minnesota, the defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

attempted to and did, employ, use, persuade, induce, entice, and coerce Minor C, a 12-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including a video file title with an MD5 value of “0B67FF3C1948975AC302151706CA3B14,” that is approximately two minutes and 41 seconds in duration, that depicts Minor C’s vagina being penetrated by a penis, where such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 4

(Production and Attempted Production of Child Pornography)

Around or about June 24, 2023, in the State and District of Minnesota, the defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

attempted to and did, employ, use, persuade, induce, entice, and coerce Minor D, a 14-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including a video file title with an MD5 value of “D4802B475F07338240037B7AF5244116,” that is approximately one minute and 48 seconds in duration, that depicts Minor D’s vagina being penetrated by an artificial penis, where such visual depiction was

produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by the SnapChat mobile application, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 5

(Production and Attempted Production of Child Pornography)

Around or about April 13, 2022, in the State and District of Minnesota, the defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

attempted to and did, employ, use, persuade, induce, entice, and coerce Minor E, a 17-year-old girl, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, including a video file title with an MD5 value of “EDF0D798A2E474EA04053684BA64B87E,” that depicts Minor E’s vagina being penetrated by a penis, where such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by cellular telephone, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 6

(Distribution of Child Pornography)

Between June 3, 2022, and September 13, 2023, in the State and District of Minnesota, the defendant,

DAPREE RICHARD CHRISTLIEB-PETERSON,

did knowingly distribute any visual depiction that has been shipped and transported in an affecting interstate and foreign commerce, by means including by computer and cellular phone, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct; all in violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

FORFEITURE ALLEGATIONS

Counts 1–6 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a) and Title 28, United States Code, Section 2461(c).

If convicted of Counts 1–6 of the Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

1. Any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
2. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property subject to forfeiture upon conviction of any of Counts 1–6 includes, but is not limited to:

1. A Lenovo laptop computer, serial number PF34YRW0;
2. An Apple iPhone XR cell phone; and
3. An Apple iPhone 12 Pro.

If any of the above property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON